

**BEFORE THE FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC 20554**

IN THE MATTER OF)	
)	CC DOCKET NO. 99-200
THE NATIONAL THOUSANDS-BLOCK)	
NUMBER POOLING ROLLOUT SCHEDULE)	DA 01-2419
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COMMENTS OF THE IDAHO PUBLIC UTILITIES COMMISSION

The Idaho Public Utilities Commission (IPUC) submits these comments in response to the Federal Communications Commission's (FCC) October 17, 2001 public notice regarding CC Docket No. 99-200. The Commission seeks comments regarding its proposed thousands-block number pooling rollout schedule.

I. SUMMARY OF COMMENTS

The IPUC is committed to making number resources available in the telecommunications marketplace and understands its obligation to implement area code relief in a timely fashion. Therefore, number conservation measures will not be used to the exclusion of, or as a substitute for, timely area code relief. However, due to the finite number of Numbering Plan Area (NPA) codes available for assignment in the North American Numbering Plan (NANP), implementing new area codes is not a solution to the increased demand for numbers that can continue indefinitely.

Because NPA relief is new to Idaho, customers in this state are unfamiliar with the potential changes ahead. Thousands-block pooling could forestall and perhaps spare Idaho customers the confusion, costs and inconvenience of a new area code's introduction. To that end, the IPUC requests that the Boise Metropolitan Statistical Area (MSA) be moved ahead to the Second Quarter

in the FCC's proposed thousands-block pooling rollout schedule so that pooling will have adequate time to effectively extend the life of the 208 NPA.

II. GENERAL COMMENTS

A. BACKGROUND

On November 9, 2000, the IPUC received a petition for relief in the 208 NPA from the NANPA on behalf of the Idaho Telecommunications Industry. In that petition, the Idaho Telecommunications Industry recommended that the IPUC adopt an all-services overlay as the means to introduce a new area code in Idaho. At that time, Idaho's only area code, "208," was projected to exhaust in the first quarter of 2003. That projection was later extended to the third quarter of 2003.

In October and November 2001, the IPUC has hosted public workshops and hearings intended to educate and gather public input regarding how best to implement area code relief in Idaho. During this entire process, the IPUC has received a significant amount of telephone calls, faxes, e-mails and letters from Idaho customers. While most of these comments address the confusion that would be caused by an overlay's 10-digit dialing requirement, many citizens recognize that confusion, cost and inconvenience would also follow the alternative geographic split approach.

Idaho is a relatively small state with a population of approximately 1.3 million people. Of the approximately 7.9 million numbers available for assignment within each area code, Idaho has just over 1 million wireless and wireline telephone customers in its first and only area code. The advent of competition and technological innovation coupled with the practice of assigning codes in blocks of 10,000 has driven the exhaust of "208."

B. THE NEED FOR POOLING

The IPUC supports the FCC's statement in its *Numbering Resource Optimization First Report and Order* wherein it determines that the implementation of thousands-block number pooling is essential to extending the life of the NANP by making the assignment and use of NXX codes more efficient.¹ From the FCC's proposed rollout schedule, thousands-block pooling will reach the Boise MSA in the fourth quarter of implementation, or March 2003. According to the IPUC's current target dates, pooling will currently reach Idaho two months after mandatory dialing of the new NPA would begin. Timely implementation of thousands-block pooling in the Boise MSA may extend the life of "208" and forestall the need to use an additional NPA.

Qwest, the predominant local exchange carrier in Boise, and many of the other local carriers are Local Number Portability (LNP) capable. Since January 2000, 99 NXX codes have been assigned in Idaho; 31 of these were assigned in the Boise MSA. Thousands-block pooling in the Boise MSA may be an effective way to increase number utilization and possibly delay the need for another NPA in Idaho, but only if it is implemented with enough time to impact NXX assignment. Our southern neighbor, Utah, implemented thousands-block pooling that significantly contributed to extending the life of its more urban "801" area code.² Idaho would like a similar opportunity.

If the National Pooling Administrator implements thousands-block pooling in states that already have the authority and the means to do so, the opportunity to preserve NPA's in unauthorized states later in the rollout could be lost. For example, states such as California, Texas,

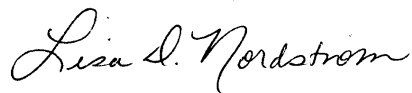
¹ *Numbering Resource Optimization, Report and Order and Further Notice of Proposed Rulemaking*, 15 FCC Rcd 7574, 7625, para. 122 (rel. March 31, 2000).

² *Utah Public Service Commission Order*, October 23, 2001. Docket Nos. 99-999-04 and 99-999-05.

Florida and Washington have received thousands-block pooling authority and yet precede Idaho on the rollout schedule.

As demonstrated by its open Rate Center Consolidation Case (USW-T-99-21) and its recent adoption of NXX reclamation duties, conserving NXX assignments is also important to the IPUC. However, these measures would be greatly enhanced by thousands-block number pooling to increase number utilization in Idaho and extend the life of the "208" area code.

Respectfully submitted this 6th day of November 2001.



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